

Morgan, Lewis & Bockius LLP
399 Park Avenue
New York, New York 10022-4689
Tel. 212.705.7000
Fax: 212.752.5378
www.morganlewis.com

Morgan Lewis
C O U N S E L O R S A T L A W

Susan F. DiCicco
Partner
+1.212.705.7421
susan.dicicco@morganlewis.com

March 2, 2015

BY ECF

The Honorable P. Kevin Castel
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Kumar, et al. v. RBS Financial Products, et al., No. 15-CV-00017-PKC (DCF)

Dear Judge Castel:

We represent the RBS Defendants¹ in the above-referenced action, but we write on behalf of Plaintiffs, as well as the Gemini Defendants² and the Trustee Defendants.³ As your Honor knows, the initial conference in this matter is currently scheduled for March 10, 2015. However, since that conference was scheduled, Plaintiffs filed a first amended complaint in this action (the “Amended Complaint”) on February 20, 2015, naming additional parties as defendants. The Amended Complaint has not yet been served on those additional parties.

¹ The RBS Defendants are RBS Financial Products Inc., f/k/a Greenwich Capital Financial Products, Inc. (“RBSFP”), RBS Securities, Inc., f/k/a Greenwich Capital Markets, Inc. (“RBS Securities”) and Greenwich Capital Commercial Funding Corporation (“GCCFC”).

² The Gemini Defendants are Gemini Real Estate Advisors LLC (“Gemini Real Estate”), Gemini East West S LLC (“Gemini S”), Gemini East West H, LLC (“Gemini H”), Gemini East West M, LLC (“Gemini M”), Gemini Property Management, LLC (“Gemini Property”), and William T. Obeid and Dante Massaro.

³ The Trustee Defendants are U.S. Bank National Association, successor by merger to LaSalle Bank National Association as Trustee for Greenwich Capital Commercial Funding Corp., Commercial Mortgage Trust 2007 GG11, Commercial Mortgage Pass Through Certificates, Series 2007-GG11, and GCCFC 2007 Connector Retail Limited Partnership (“GCCFC”).

Morgan Lewis
C O U N S E L O R S A T L A W

The Honorable P. Kevin Castel
March 2, 2015
Page 2

We write to apprise the Court that all parties who have appeared are amenable to adjourning the initial conference until the newly-added defendants have been served and have appeared. We believe a brief adjournment will conserve the time and resources of the Court and the parties so that the joint submissions and schedules submitted to the Court are made in accordance with the Federal Rules and Your Honor's Rules of Practice, and on behalf of all parties in the case.

Respectfully submitted,

A handwritten signature in cursive script, reading "Susan F. DiCicco".

Susan F. DiCicco

cc: All counsel (by ECF)